

UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE:	:	
Tara Marie Newman	:	Chapter 13
	:	No.: 20-14525-MDC
Debtor(s)	:	

RESPONSE OF DEBTOR TO THE MOTION FOR RELIEF OF AUTOMATIC
STAY FILED BY PENNYMAC LOAN SERVICES, LLC.

Debtor, Tara Marie Newman, by and through their undersigned Counsel, Brad J. Sadek, in response to the Motion for Relief filed by Pennymac Loan Services, LLC. hereby submit the following:

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.
6. Admitted in part, denied in part. Debtor avers that payments were sent via checks that were not yet cashed and expects to be able to catch up any remaining arrears prior to the Hearing date.
7. Debtor is unsure of the same as she remitted some payments.
8. Denied.
9. No objection to Movant's request to communicate and work with Debtor to offer any agreements.
10. No response required.

WHEREFORE, based on the aforementioned, Movant shall be denied an Order modifying the Automatic Stay under Bankruptcy Code Section 362.

Respectfully submitted,

Dated: May 10, 2021

/s/ Brad J. Sadek, Esq.
Attorney for the Debtor
Sadek & Cooper
1315 Walnut Street, #502
Philadelphia, PA 19107
(215) 545-0008

CERTIFICATE OF SERVICE

I Brad J. Sadek, Esq. certify that on the date indicated below served a true and correct copy of the Debtor's Response to the Motion for Relief from Automatic Stay by electronic or Regular U.S. Mail on all creditors and the following parties:

William C. Miller, Esq.
Chapter 13 Trustee

Rebecca A. Solarz
Electronic Notice
Attorney for Movant

Dated: May 10, 2021

/s/Brad J. Sadek, Esq.
Brad J. Sadek, Esq.
Attorney for Debtor
1315 Walnut Street
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